

Howard Superior Court 2

Howard County, Indiana

HOWARD COUNTY COURT
STATE OF INDIANA

ESTATE OF DAVID DAUGHERTY,
by Aaron St. Clair, Personal Representative,

Plaintiff

VS.

GM COMPONENTS HOLDINGS, LLC,
and JOSHUA M. KEELER,

Defendants

SUMMONS

The State of Indiana to Defendant: GM COMPONENTS HOLDINGS, LLC, c/o Corporation Service Company, 135 North Pennsylvania St., Suite 1610, Indianapolis, Indiana, 46204.

You have been sued by the entitled named "plaintiff" in the court stated above.

The nature of the suit against you is stated in the Complaint which is attached to this document. It also states the demand which the plaintiff has made and wants from you.

You must answer the Complaint in writing, by you or your attorney, within twenty (20) days, commencing the day after you receive this Summons (you have twenty-three (23) days to answer if this summons was received by mail), or judgment will be entered against you for what the plaintiff has demanded.

If you have a claim for relief against the plaintiff arising from the same transaction or occurrence you must assert it in your written answer.

Date 5/3/2021*Debbie Stewart*

LW

Clerk, Howard County Court (Seal)

Alan D. Wilson #11360-34
Attorney for Plaintiff
515 West Sycamore Street
Kokomo, IN 46901
(765) 457-9321

DESIGNATION OF SERVICE

Plaintiff hereby designates the following manner of service: Certified Mail - Return Receipt Requested.

RETURN OF SERVICE OF SUMMONS

I hereby certify that I have served the within Summons:

1. By delivering on the _____ day of _____, 2021, a copy of this Summons and a copy of the Complaint to the within-named defendant.
2. By mailing, on the _____ day of _____, 2021, for the within-named defendant, copy of the Summons and a copy of the Complaint, it being the place of business/residence of said person at the time the copy was mailed.
3. By _____. The within Summons was not served because _____



All done in Howard County, Indiana

Clerk, Howard County

By _____

STATE OF INDIANA)
)
) SS:
COUNTY OF HOWARD)

ESTATE OF DAVID DAUGHTRY,)
by Aaron St. Clair, Personal Representative.)
)
)
Plaintiff,)
)
VS.)
)
GM COMPONENTS HOLDINGS, LLC, and)
JOSHUA M. KEELER,)
)
Defendants.)

COMPLAINT FOR WRONGFUL DEATH

Comes now Plaintiff, Aaron St. Clair, in his capacity as Personal Representative of the Estate of David Daughtry, and for this cause of action alleges and says:

1. That on the evening of May 1, 2019, David Daughtry was employed by Roadrunners Trucking, and was making a delivery on the Defendant's property on East Lincoln Road, in Kokomo, Howard County, Indiana.
2. After David Daughtry exited his work vehicle, and was proceeding on foot, he was struck by a vehicle driven by Joshua M. Keeler.
3. David Daughtry was severely injured as a result of being struck, and ultimately died from his injuries on March 7, 2020.
4. That the accident was the proximate result, in whole or in part, of the negligence of the Defendants.

5. That as a direct and proximate result of the negligence of the Defendants, the Plaintiff suffered damages, loss of the love and companionship of David Daughtry, and other damages pursuant to I. C. 34-23-1-2.

6. That at all pertinent times, David Daughtry was acting in a careful and prudent manner.

WHEREFORE, Plaintiff prays for judgment against the Defendants, for an award of damages per I. C. 34-23-1-2, and for all other just and proper relief in the premises.

Alan D. Wilson #11360-34
515 West Sycamore Street
P. O. Box 958
Kokomo, IN 46903-0958
(765)457-9321

/s/ Alan D. Wilson